

ATTACHMENT 63

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: DA VINCI SURGICAL
ROBOT ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:) Lead Case No. 3:21-cv-03825-VC
ALL CASES)

SURGICAL INSTRUMENT SERVICE
COMPANY, INC.,

Plaintiff,

vs.

INTUITIVE SURGICAL, INC.,

Defendant.

REMOTE VIDEOTAPED DEPOSITION OF
T. KIM PARNELL, Ph.D.
Friday, March 10, 2023
Volume I

Reported by:
NADIA NEWHART
CSR No. 8714
Job No. 5783314
PAGES 1 - 251

1 only associated with the -- the assessment of the
2 cost associated with the Intuitive refurbishment or
3 repair process and how they would do it.

4 They costed it on the basis of -- they
5 appeared to at least cost it out on the basis of 04:46:21
6 performing the refurbishment in the United States.

7 And I would go on to say they -- their refurbishment
8 program included a lot of parts replacement that is
9 not a part of the Rebotix process or Restore or
10 anything that was contemplated by Iconocare or any 04:46:40
11 of the others.

12 So it was a very different process. It was a
13 more costly process, and they decided it wasn't cost
14 effective. I can understand that.

15 Q Let's look at the last appearance of the term 04:46:52
16 "quality." This is page 128, paragraph 286.

17 A Page 128, 286. Okay. Yes.

18 Q And here you discuss how Intuitive performs
19 analyses of RMA data as part of its standard quality
20 control activities. 04:47:14

21 So that's also not what you were discussing
22 before the break, correct?

23 A That's right. What I was discussing before
24 the break was questions about what they -- what
25 Intuitive does or might do with regard to quality 04:47:25

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [X] was [] was not requested.

16 I further certify that I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date subscribed
20 my name.

21
22 Dated: March 14, 2023

23 
24

NADIA NEWHART

25 CSR NO. 8714

Page 248